



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 26, 2021

By ECF and e-mail

Hon. John P. Cronan
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Desai v. Jaddou*, No. 21-cv-5468 (JPC)¹

Dear Judge Cronan:

This Office represents the government in the above-referenced matter in which plaintiff alleges that U.S. Citizenship and Immigration Services (“USCIS”) has unreasonably delayed in adjudicating her Application for Employment Authorization (Form I-765) and Application for Travel Document (I-131). I write respectfully, with the consent of plaintiff’s counsel, to request that the Court adjourn the initial pre-trial conference, which is currently scheduled for September 2, 2021 at 10:00 a.m., *sine die*. The adjournment is requested because tomorrow (the deadline to respond to the complaint), the government intends to submit a pre-motion letter for its anticipated motion to dismiss based on lack of jurisdiction and failure to state a claim pursuant to Rule 6.A of this Court’s Individual Rules. The parties have conferred on a briefing schedule for the anticipated motion to dismiss briefing, and in light of the fact that the parties anticipate entering into briefing shortly, the government respectfully respects the adjournment of the conference. This is the government’s first request for an adjournment of the initial pre-trial conference, and as explained above, plaintiff’s counsel consents to this request.

I thank the Court for its consideration of this request.

Defendant's request is granted. The IPTC scheduled for September 2, 2021 is adjourned *sine die*. Respectfully submitted,

AUDREY STRAUSS
United States Attorney


JOHN P. CRONAN
United States District Judge

s/ Rebecca R. Friedman
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SO ORDERED. Date:
August 27, 2021
New York, New York

¹ Ur M. Jaddou is automatically substituted for Tracy Renaud. *See* Fed. R. Civ. P. 25(d).